

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,
et al.

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**INFORMATIVE MOTION OF THE OFFICIAL COMMITTEE OF
RETIRED EMPLOYEES OF THE COMMONWEALTH
OF PUERTO RICO REGARDING PARTICIPATION
IN THE APRIL 24-25, 2019 OMNIBUS HEARING**

The Official Committee of Retired Employees of the Commonwealth of Puerto Rico (the “**Retiree Committee**”) hereby submits this informative motion in response to this Court’s *Order Regarding Procedures for Attendance, Participation and Observation of April 24-25, 2019, Omnibus Hearing* [Dkt. No. 6240], and respectfully states as follows:

Robert Gordon, Landon Raiford, and Héctor Mayol Kauffmann will appear in person on behalf of the Retiree Committee at the April 24-25, 2019 omnibus hearing in in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal

¹ The Debtors in these jointly-administered PROMESA title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747).

Building, San Juan, Puerto Rico 00918-1767. Counsel intend to present argument on the following matters:

1. *Motion of Official Committee of Unsecured Creditors, Under Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, Establishing Procedures with Respect to Objections to Claims Asserted by Holders of Bonds Issued by Employees Retirement System of Government of Puerto Rico and Requesting Related Relief* [Case No. 17-3283, Dkt. 5589, Case No. 17-3566, Dkt. 386]
2. *Motion of the Ad Hoc Group of General Obligation Bondholders, Under Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, Establishing Procedures with Respect to Omnibus Conditional Objection to Claims Filed or Asserted by the Public Buildings Authority, Holders of Public Buildings Authority Bonds, and Holders of Certain Commonwealth General Obligation Bonds* [Case No. 17-3283, Dkt. 6104]
3. *Motion of the Financial Oversight and Management Board of Puerto Rico for Entry of an Order Equitably Tolling the Time Prescribed by 11 U.S.C. § 546 to Bring Certain Avoidance Actions* [Case No. 17-3283, Dkt. 6118]
4. *Urgent Joint Motion for Entry of Order Approving Stipulation and Agreed Order By and Among Financial Oversight and Management Board, Its Special Claims Committee, and Official Committee of Unsecured Creditors Related to Joint Prosecution of Debtor Causes of Action* [Case No. 17-3283, Dkt. 6305]
5. *Motion of Official Committee of Unsecured Creditors for Order Authorizing Committee to Pursue Certain Causes of Action on Behalf of Commonwealth and Granting Related Relief* [Case No. 17-3283, Dkt. 6325]

6. *Motion of Individual General Obligation Bondholder (1) to Permit Electronic Filing by Pro Se Parties; (2) (In The Alternative to “(1)”) To Set Up A Mechanism to Permit Pro Se Parties to File and Serve Papers by Submission by Email to Prime Clerk; (3) to Permit Pro Se Parties to Listen into Proceedings by Telephone; and (4) To Order the Appointment a Committee for Individual and Other Modest-Sized Bondholders* [Case No. 17-3283, Dkt. 6128]
7. *Motion of Debtor for Leave to File an Amended and Supplemented Adversary Complaint and Requesting Determination of Count Briefed but Not Decided by Title III Court’s Order on Motions for Summary Judgment* [Adv. Proc. No. 17-213, Dkt. 236]
8. *Motion of Andalusian Global Designated Activity Company, Mason Capital Master Fund, LP, and The Puerto Rico Funds for a Protective Order* [Case No. 17-3283, Dkt. 6234, Case No. 17-3566, Dkt. 440]
9. *Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Compel Production of Documents in Privilege Log Categories 1 to 4 [Attorney-Client Privilege, Attorney Work Product, Common Interest]* [Case No. 17-3283, Dkt. 6253, Case No. 17-3566, Dkt. 443]
10. *Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Compel Production of Documents in Privilege Log Categories 1, 5 to 7 [Deliberative Process Privilege and Executive Privilege]* [Case No. 17-3283, Dkt. 6320, Case No. 17-3566, Dkt. 446]

Counsel also will appear to respond as necessary to any statements made by any party in connection with the above-captioned Title III cases.

WHEREFORE, the Retiree Committee respectfully requests that the Court take notice of the foregoing.

April 18, 2019

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By:

/s/ Robert Gordon

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Respectfully submitted,

BENNAZAR, GARCÍA & MILIÁN, C.S.P.

By:

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